

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

EDUARDO GARZA MORA,

Plaintiff,

vs.

THE GILLETTE COMPANY,

Defendant.

Civil Action No.: 05-11651NMG

**JOINT MOTION TO EXTEND THE DEADLINES  
SET FORTH IN THE SCHEDULING ORDER**

At Plaintiff's request, Plaintiff Eduardo Garza Mora and Defendant The Gillette Company, collectively, the "Parties", jointly move that the deadlines set forth in the Court's Scheduling Order, dated November 16, 2005 in the above-captioned matter be extended for a period of one month as described below:

- (i) the deadline for the service of written discovery requests, currently set for February 28, 2006, shall be extended through and including March 31, 2006 and the deadline for the answers to such requests, currently set for March 31, 2006, shall be extended through and including April 30, 2006;
- (ii) the deadline for all fact depositions and for the close of discovery, currently set for May 31, 2006, shall be extended through and including June 30, 2006;
- (iii) the deadline for Plaintiff's designation of trial experts and for expert disclosure, currently set for April 30, 2006, shall be extended through and including May 31, 2006;
- (iv) the deadline for Defendant's designation of trial experts and expert disclosures, currently set for May 15, 2006 shall be extended through and including June 15, 2006;

(v) the deadline for the completion of expert depositions, currently set for June 30, 2006 shall be extended through and including July 31, 2006; and

(vi) the deadline for all dispositive motions, including motions for summary judgment, currently set for July 31, 2006, shall be extended through and including August 31, 2006, and the deadlines for opposition and reply brief shall be enlarged accordingly.

In support of this motion, the Parties state that, due to the trial schedule of Plaintiff's counsel, Plaintiff required additional time to respond to the discovery requests served by Defendant, and all others deadlines were adjusted accordingly.

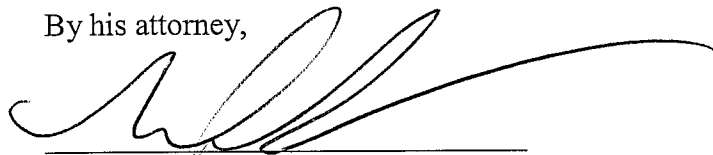
WHEREFORE, the Parties hereby move that the deadlines set forth in the Scheduling Order, dated November 16, 2005 be extended as described above.

EDUARDO GARZA MORA

THE GILLETTE COMPANY

By his attorney,

By its attorneys,



Neil Osborne (BBO# 567674)  
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/s/ Anthony D. Rizzotti  
Anthony D. Rizzotti (BBO# 561967)  
Christine A. Phipps (BBO# 658942)  
ROPES & GRAY LLP  
One International Place  
Boston, MA 02110-2624  
(617) 951-7000

Dated: February 16, 2006

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Certificate of Service

I hereby certify that on February 22, 2006, a true and correct copy of the foregoing document was served upon the attorney of record, Neil Osborne, Esq., 41 West Street, 7th Floor, Boston, MA 02110, by certified mail.

/s/ Anthony D. Rizzotti  
Anthony D. Rizzotti